

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN**

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

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) Chapter 9

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) Case No. 13-53846

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) Hon. Steven W. Rhodes

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**SYNCORA GUARANTEE INC. AND SYNCORA CAPITAL ASSURANCE  
INC. DISCLOSURE OF WITNESSES AND DOCUMENTS IN ADVANCE  
OF THE DECEMBER 17-19, 2013 HEARINGS**

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On November 27, 2013 this Court held a hearing regarding the the City of Detroit (the “City’s”) *Motion for Entry of an Order Establishing Pre-Trial and Trial Procedures and Setting Additional Hearing Dates* dated November 22, 2013 [Docket No. 1788] (the “Trial Procedure Motion”). During the hearing related to the Trial Procedure Motion, certain objectors to the City’s Trial Procedures Motion agreed to provide a list of will-call and may-call witnesses by December 2, 2013. Syncora Guarantee Inc. and Syncora Capital Assurance Inc. (collectively, “Syncora”) file this disclosure of witnesses in connection with the hearing on the City’s Assumption Motion [Docket Nos. #17, #157] and the City’s Motion to Approve Post-Petition Financing [Docket No. #1520] set by this Court for December 17-19, 2013. Syncora may call the following witnesses:

**Witnesses**

1. Alexandra Schwarzman

2. Scott Davido

Syncora reserves the right, consistent with the parties' agreement of November 27, 2013, to designate rebuttal witnesses by December 12, 2013.

Dated: December 2, 2013

Respectfully submitted,

**KIRKLAND & ELLIS LLP**

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